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Attorneys for Plaintiff
James R. Glidewell Dental Ceramics, Inc.
d/b/a Glidewell Laboratories

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

JAMES R. GLIDEWELL DENTAL
CERAMICS, INC.,

Plaintiff,

vs.

KEATING DENTAL ARTS, INC.,

Defendant.

Case No. SACV11-01309-DOC(ANx)

**DECLARATION OF GARY
PRITCHARD IN SUPPORT OF
PLAINTIFF'S *EX PARTE*
APPLICATION TO FILE CERTAIN
DOCUMENTS UNDER SEAL IN
SUPPORT OF JAMES R.
GLIDEWELL DENTAL CERAMICS,
INC.'S MOTIONS FOR SUMMARY
JUDGMENT**

Ctrm: 9D, Hon. David O. Carter

Pre-Trial Conf.: January 28, 2013
Jury Trial: February 26, 2013

AND RELATED
COUNTERCLAIMS.

Snell & Wilmer

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ORIGINAL

1 I, Gary Pritchard, declare:

2 1. I am an attorney licensed to practice law in the State of California and
3 am an in-house counsel for Plaintiff James R. Glidewell Dental Ceramics, Inc.
4 ("Plaintiff") in the above-entitled action. Unless otherwise stated, I have first-hand,
5 personal knowledge of the facts stated herein and, if called to testify, could and
6 would competently testify to those facts.

7 2. The documents identified as the Lodged Documents in Plaintiff's *Ex*
8 *Parte* Application to File Under Seal Certain Documents in Support of James R.
9 Glidewell Dental Ceramics, Inc.'s Motions for Summary Judgment contain
10 discovery material produced by Plaintiff designated "Confidential" and "Attorney's
11 Eyes Only," in accordance with the Court's January 30, 2012 Protective Order.
12 Dkt. #19.

13 3. The documents identified as the Lodged Documents in the *Ex parte*
14 Application contain confidential information relating to Plaintiff's business
15 development, marketing strategies, trade secrets, and other confidential and
16 proprietary information that, if disclosed to competitors, could cause Plaintiff
17 substantial harm. Also, because the Lodged Documents contain information
18 relating to Plaintiff's business development, marketing strategies, trade secrets, and
19 other confidential and proprietary information, disclosure could result in misuse by
20 unscrupulous third parties and competitors by replicating valuable aspects of the
21 BruxZir brand crown, and could compromise Plaintiff's bargaining position in
22 future business negotiations.

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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed on November 19, 2012, at Marina del Rey, California.

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7 Gary Pritchard

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DECLARATION OF GARY PRITCHARD ISO PLAINTIFF'S
EX PARTE APPLICATION TO FILE UNDER SEAL
CASE NO. SACV11-01309 DOC (ANx)

Glidewell Laboratories v. Keating Dental Arts, Inc.
U.S. District Court, Central District of California, Case No. SACV11-01309-DOC (ANx)

PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 600 Anton Boulevard, Suite 1400, Costa Mesa, CA 92626-7689.

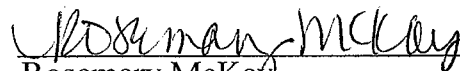
On November 19, 2012, I served, in the manner indicated below, the foregoing document(s) described as **DECLARATION OF GARY PRITCHARD IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION TO FILE CERTAIN DOCUMENTS UNDER SEAL IN SUPPORT OF JAMES R. GLIDEWELL DENTAL CERAMICS, INC.'S MOTIONS FOR SUMMARY JUDGMENT** on the interested parties in this action by placing true copies thereof, enclosed in sealed envelopes, at Costa Mesa, addressed as follows:

Please see attached Service List

- ☐ BY REGULAR MAIL: I caused such envelopes to be deposited in the United States mail at Costa Mesa, California, with postage thereon fully prepaid. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service each day and that practice was followed in the ordinary course of business for the service herein attested to (C.C.P. § 1013(a)).
- ☐ BY FACSIMILE: (C.C.P. § 1013(e)(f)).
- ☐ BY OVERNIGHT DELIVERY: I caused such envelopes to be delivered by air courier, with next day service, to the offices of the addressees. (C.C.P. § 1013(c)(d)).
- ☒ BY PERSONAL SERVICE: I caused such envelopes to be delivered by hand to the offices of the addressees. (C.C.P. § 1011(a)(b)).
- ☐ BY ELECTRONIC MAIL: I caused such document(s) to be delivered electronically to the following email address(es): David G. Jankowski david.jankowski@kmob.com, Jeffrey L. Van Hoosear Jeffrey.vanhoosear@kmob.com, Lynda J. Zadra-Symes Lynda.zadra-symes@kmob.com, litigation@kmob.com; Thomas L. Gourde tgourdelaw@cox.net

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 19, 2012, at Costa Mesa, California.


Rosemary McKay

PROOF OF SERVICE

1 *Glidewell Laboratories v. Keating Dental Arts, Inc.*
2 U.S. District Court, Central District of California, Case No. SACV11-01309-DOC (ANX)

3 **SERVICE LIST**

4 David G. Jankowski
5 Jeffrey L. Van Hoosear
6 Lynda J Zadra-Symes
7 Knobbe Martens Olson and Bear LLP
8 2040 Main Street, 14th Floor
9 Irvine, CA 92614

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